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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JILL REBECCA CUEVAS,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:22-cv-01663-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Commissioner), respectfully moves this Court for a 30-day extension of time to file her cross-motion to affirm in this case, changing the date on which the cross-motion is due from May 1, 2023, to May 31, 2023. This is Defendant's first request for an extension of the deadline to file the cross-motion. Defendant conferred with counsel for Plaintiff, who confirmed that Plaintiff does not object to the request.

In support of this motion, the Commissioner respectfully states as follows:

1. Good cause for an extension exists because the Commissioner requires additional time to review the defensibility of this case. An extended deadline would allow Plaintiff time to consider any remand offer and the parties to negotiate the terms of any remand offer. An extension would also

1 provide Defendant adequate time to draft a cross-motion to affirm if the parties cannot agree to a
2 voluntary remand.

3 2. Thus, Defendant requests an extension of 30 days, until May 31, 2023, to file the cross-
4 motion to affirm.

5 3. This request is made in good faith and is not intended to delay the proceedings in this
6 matter.

7 For the foregoing reasons, Defendant respectfully requests until May 31, 2023, to file the
8 cross-motion to affirm.

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10 Dated: April 21, 2023

Respectfully submitted,

11 JASON M. FRIERSON
12 United States Attorney

13 */s/ Sohayl Vafai*
14 SOHAYL VAFAI
Special Assistant United States Attorney

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19 IT IS SO ORDERED:

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21 _____
DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

22 DATED: April 24, 2023
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** to be served upon the following by:

CM/ECF:

Daniel H. Fishman
dan@ssihelp.us

Hal Taylor
haltaylorlawyer@gbis.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 21, 2023

/s/ Sohayl Vafai
SOHAYL VAFAI
Special Assistant United States Attorney